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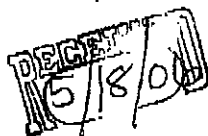
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Docket Clerk

May 18, 2006

Fruit & Vegetable Programs AMS, USDA
1400 Independence Avenue, SW, Mail Stop 0243
Washington, DC 20250-0243



Re: Docket Number FV06-1290-1PR
FR Vol. 71, No. 76, pages 20353-20357

To Whom It May Concern:

The Raisin Bargaining Association (RBA) represents 1,800 hard working grape farmers in the San Joaquin Valley of California. RBA growers represent roughly one-third of the California Raisin industry, which produces nearly 40% of the world supply of raisins. My comments are related to your proposed rule in regards to the Specialty Crop Block Grant Program.

We are certainly appreciative of the fact that the Agricultural Marketing Service (AMS) is proposing regulations to provide a basis for the implementation of a program designed to provide all specialty crops with the opportunity to increase their competitiveness in the marketplace. This program is long overdue and although the specialty crop commodities may have differences of opinion regarding the methods of expending funds that may eventually become available, they likely all agree that all commodities should have an equal opportunity to access some benefit.

Specifically in regards to Section 1290.4(a) of the proposed regulation, which deals with the eligibility of projects under the program, there is a provision for a priority to be given to "fresh specialty crop projects." It appears that canned, dried, frozen, or otherwise processed specialty crops would not enjoy the identical opportunity to qualify for such project funding. The thought process behind such a regulation does not correlate to the USDA dietary guidelines for Americans, which encourages the consumption of a variety of fruits and vegetables and does not distinguish between fresh, dried, canned, or frozen products.

Every specialty crop, whether fruit, vegetable, processed, or fresh has a unique benefit to offer the consuming public. Every specialty crop grower, whether fruit, vegetable, processed, or fresh understands the need to effectively market their product to the consuming public. Should the USDA provide some needed assistance, then every specialty crop, whether fruit, vegetable, processed, or fresh should be eligible to participate on an equal basis for those funds.

The Raisin Bargaining Association strongly opposes any preferential treatment in funding allocation with the proposed rule regarding the Specialty Crop Block Grant Program. We would hope that the AMS would reconsider its original position in regards to the priority suggested for the "fresh specialty crop projects" and create a fair and even playing field for all commodities that are categorized as a specialty crop. Thank you for your attention to this matter on behalf of the specialty crop industry and California Raisins in particular.

Best regards,

Glen Goto
Chief Executive Officer

GG:tg